

**THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

New Jersey Carpenters Health Fund, New Jersey
Carpenters Vacation Fund and Boilermaker
Blacksmith National Pension Trust, *on Behalf of
Themselves and All Others Similarly Situated,*

Plaintiffs,

v.

Residential Capital, LLC, Residential Funding, LLC,
Residential Accredited Loans, Inc., Bruce J. Paradis,
Kenneth M. Duncan, Davee L. Olson, Ralph T. Flees,
Lisa R. Lundsten, James G. Jones, David M. Bricker,
James N. Young, Residential Funding Securities
Corporation d/b/a GMAC RFC Securities, Goldman,
Sachs & Co., RBS Securities, Inc. f/k/a/ Greenwich
Capital Markets, Inc. d/b/a RBS Greenwich Capital,
Deutsche Bank Securities, Inc., Citigroup Global
Markets, Inc., Credit Suisse Securities (USA) LLC,
Bank Of America Corporation *as successor-in-interest*
to Merrill Lynch, Pierce, Fenner & Smith, Inc., UBS
Securities, LLC, JPMorgan Chase, Inc., *as successor-*
in-interest to Bear, Stearns & Co., Inc., and Morgan
Stanley & Co., Inc.,

Defendants.

Case No.: 08-CV-8781 (HB)

ECF CASE

**DECLARATION OF MICHAEL EISENKRAFT IN SUPPORT OF THE MOTION OF
LEAD PLAINTIFF NEW JERSEY CARPENTERS HEALTH FUND, PLAINTIFF NEW
JERSEY CARPENTERS VACATION FUND, AND ADDITIONAL CLASS
REPRESENTATIVE LOCAL 74 USWU WELFARE FUND TO MODIFY THE
CERTIFIED CLASS TO ENCOMPASS ADDITIONAL OFFERINGS AND DESIGNATE
AN ADDITIONAL CLASS REPRESENTATIVE**

Michael Eisenkraft declares the following, pursuant to 28 U.S.C. §1746:

1. I am a Partner with the law firm Cohen Milstein Sellers & Toll PLLC and counsel
to Lead Plaintiff New Jersey Carpenters Health Fund (“Carpenters Health Fund”), Plaintiff New

Jersey Carpenters Vacation Fund (“Carpenters Vacation Fund”) (together, the “New Jersey Carpenters Funds”) and Proposed Class Representative Local 74 USWU Welfare Fund (“Local 74 Welfare Fund”), in the above-captioned action. I am familiar with this matter and submit this Declaration in support of the Motion to Modify the Certified Class.

2. Attached here as Exhibit 1 is a true and correct copy of Proposed Class Representative Local 74 Welfare Fund’s Class Action Securities Certification.

I declare under penalty of perjury that the foregoing is true and correct.

Date: June 25, 2013

/s/ Michael Eisenkraft
Michael Eisenkraft

CERTIFICATE OF SERVICE

I, Kenneth M. Rehns, counsel for Plaintiffs, the New Jersey Carpenters Funds, and Additional Proposed Class Representative, Local 74 USWU Welfare Fund, hereby certify that on June 25, 2013, I caused the foregoing document to be filed via ECF which sent a copy of this Declaration by electronic mail to all counsel of record.

/s/ Kenneth M. Rehns
Kenneth M. Rehns